

CORRESP CONTROL  
OUTGOING LTR NO.

DOE ORDER # SR20.2

94 RF 06447 **EG&G ROCKY FLATS**



000030929

DIST.	
AMARAL, M.E.	
BERMAN, H.S.	
BRANCH, D.B.	
CARNIVAL, G.J.	
COPP, R.D.	
DAVIS, J.G.	
FERRERA, D.W.	
HANNI, B.J.	
HARMAN, L.K.	
HEALY, T.J.	
HEDAHL, T.	
HILBIG, J.G.	
HUTCHINGS, N.M.	
KELL, R.E.	
KIRBY, W.A.	
KUESTER, A.W.	
MAHAFFEY, J.W.	
MANN, H.P.	
MARX, G.E.	
MCDONALD, M.M.	
MCKENNA, F.G.	
MONTROSE, J.K.	
MORGAN, R.V.	
POTTER, G.L.	
PIZZUTO, V.M.	
RISING, T.L.	
SANDLIN, N.B.	
SETLOCK, G.H.	
STEWART, D.L.	
STIGER, S.G.	
SULLIVAN, M.T.	
SWANSON, E.R.	
WILKINSON, R.B.	
WILSON, J.M.	
WYANT, R.D.	

**EG&G ROCKY FLATS, INC.**  
CKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

une 13, 1994

94-RF-06447

F. R. Lockhart  
Environmental Restoration Division  
DOE, RFFO

IMPLEMENTATION OF SUBSECTION 3.1.3.3 OF THE FINAL INTERIM  
MEASURE/INTERIM REMEDIAL ACTION DECISION DOCUMENT (IM/IRA DD) FOR  
SOLAR EVAPORATION PONDS OPERABLE UNIT 4 - SRK-125-94

Please forward the attached letter to Colorado Department of Health (CDH) and the  
Environmental Protection Agency (EPA) as our proposal to implement subsection 3.1.3.3 of  
the IM/IRA DD for Solar Evaporation Ponds Operable Unit 4 (OU 4). EG&G is requesting  
concurrency to inspect the tanks described in the IM/IRA on a monthly schedule since  
Building 910 will not be in operation. Building 910 is being placed in a "stand-by" condition  
for the next year or so, while EG&G evaluates Building 374's performance in processing  
the Temporary Modular Storage Tank water.

*S. R. Keith*  
S. R. Keith  
Program Manager  
Solar Pond Projects

MDB:clh

Orig. and 1 cc - F. R. Lockhart

S. Howard - DOE, RFFO  
M.A. Witherill - " "

CORRESP CONTROL ☒  
ADMIN RECORD/ORG ☒  
TRAFFIC ☒  
PATS/T130G ☐

CLASSIFICATION:

UNCLASSIFIED	
CONFIDENTIAL	
SECRET	

AUTHORIZED CLASSIFIER  
SIGNATURE

DATE

IN REPLY TO RFP CC NO:

ACTION ITEM STATUS

☐ PARTIAL/OPEN

☐ CLOSED

LTR APPROVALS:

EG&G TYPYST INITIALS

*clh*

A-OU04-000784

TO: CDH and EPA  
FROM: DOE

cc: F. Dowsett

The Department of Energy requests Colorado Department of Health and Environmental Protection Agency concurrence with our proposal to implement subsection 3.1.3.3 of the Final Interim Measure/Interim Remedial Action Decision Document (IM/IRA DD) for Solar Evaporation Ponds Operable Unit 4, as described in this letter. The evaporators were included in the IM/IRA DD due to concerns over the ability of the plant waste treatment facility, Building 374, to treat the volume of water. Last year, DOE performed significant maintenance on the treatment facility. Operations in Building 910 have been suspended while EG&G determines whether Building 374 can effectively process the Temporary Modular Storage Tank water.

Since Building 910 is not operating, DOE is proposing a change to the inspection schedule from the current daily inspection of the tank systems to a monthly inspection. The daily inspections are not necessary to ensure protection of the human health and the environment because Building 910's evaporators and tank systems are not in operation and have been rinsed and drained. In addition, the feed line from the Temporary Modular Storage Tanks has been sealed off so that feed cannot be introduced into the system. Building 910 will be maintained in a "stand-by" condition through fiscal year 1995. Should a situation arise where EG&G would need to reintroduce hazardous waste into the building, daily inspections would be performed until such time as the waste was removed and the building once again placed into the stand-by condition.

Presented below the requirements listed in §264.195 and a short description of how EG&G will satisfy the requirement.

#### §264.195 – INSPECTIONS

- a) *The owner or operator must develop and follow a schedule and procedure for inspecting overflow controls.*

Hazardous waste cannot be introduced into the system because the feed line has been sealed off, so the tanks cannot overflow.

The overflow controls will be tested as a part of start-up should the tank be used during the stand-by period.

- b) *The owner or operator must inspect at least once each operating day:*

The tank systems will not be operated, however, the system will be inspected on a monthly schedule as best management practice.

- 1) *Aboveground portions of the tank system, if any, to detect corrosion or releases of waste;*

There will not be any waste in the tank to cause corrosion or leak from the tank because the tanks have been rinsed and drained.

- 2) *Data gathered from monitoring and leak detection equipment (e.g., pressure or temperature gauges, monitoring wells) to insure that the tank system is being operated according to its design; and*

Leak detection and monitoring is by visual inspection. The tanks are drained, rinsed and are not being operated.

The tank system will be inspected on a monthly schedule as a best management practice.

- 3) *The construction materials and the area immediately surrounding the externally accessible portion of the tank system, including the secondary containment system, (e.g., dikes) to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation). [NOTE - Section 264.15 (c) requires the owner or operator to remedy any deterioration or malfunction he finds. Section 264.196 requires the owner or operator to notify the Director within 24 hours of confirming a leak. Also, 40 CFR Part 302 may require the owner or operator to notify the National Response Center of a release]*

There will not be any waste in the tank.

- (c) This requirement is not addressed because there is no cathodic protection required for these tank systems
- (d) *The owner or operator must document in the operating record of the facility an inspection of those items in paragraphs (a) through (c) of this section.*

Records for the monthly inspections will be maintained for those items in (a) through (c) of this section.